

**LEE LITIGATION GROUP, PLLC**

30 EAST 39<sup>TH</sup> STREET, SECOND FLOOR

NEW YORK, NY 10016

TEL: 212-465-1180

FAX: 212-465-1181

INFO@LEELITIGATION.COM

WRITER'S DIRECT: 212-465-1124  
anne@leelitigation.com

**Via ECF**

April 3, 2015

The Honorable William H. Pauley III, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Sun, et al. v. Guang Jun Li, et al.*  
Case No. 13-CV-8507

Dear Judge Pauley:

We are counsel to Plaintiffs. Further to the parties' prior correspondence and the Court's January 16, 2015 referral to Magistrate Judge Kevin Nathaniel Fox for a settlement conference (ECF Dkt. No. 59), we write to inform the Court of the following events, and to respectfully request an adjournment of the pretrial conference currently scheduled for April 24, 2015 at 10:30 a.m., and the April 17, 2015 date for pretrial submissions.

As the Court is aware, the settlement conference before Judge Fox was scheduled for April 2, 2015 at 10:30 a.m. Unfortunately, although the undersigned, together with four (4) plaintiffs and a Mandarin Chinese interpreter appeared for the settlement conference, Defendants failed to appear. When contacted by Judge Fox's Clerk the morning of the conference, Defendants' counsel's receptionist informed the Clerk that Defendants' counsel was "away on a business trip." When Judge Fox's Clerk contacted Defendants' counsel on his cellphone, he stated that (despite the ECF Scheduling Order, correspondence with the undersigned about the conference and a telephone call with the undersigned about the conference the week prior), he "was unaware of the settlement conference." In view of the foregoing, Judge Fox proposed new dates to reschedule the settlement conference in early May, 2015, and asked the parties to discuss and work out the new conference date when Defendants' counsel returns from his business trip on Monday April 6, 2015<sup>1</sup>.

In view of the foregoing, we respectfully request an adjournment of the April 24, 2015 pretrial conference (and April 17, 2015 preconference submission) *sine die*, or alternatively, to a date in late May or early June 2015, should the parties fail to reach a settlement at the rescheduled conference.

---

<sup>1</sup> Notwithstanding the parties' agreement to reschedule the settlement conference, at Judge Fox's direction, on April 3, 2015, the undersigned made an application for reimbursement of legal fees incurred in attending the conference (ECF Dkt No. 64).

This is the parties' second request for adjournment of the pretrial conference. Defendants' counsel consents to the request.

We thank Your Honor for your consideration on this matter.

Respectfully,  
*/s/ Anne Seelig*

cc: All parties via ECF